



**U.S. Department of Justice**  
Sue J. Bai  
Head of the National Security  
National Security Division

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*National Security Cyber Section  
950 Pennsylvania Avenue N.W.  
Washington, D.C. 20530*

May 9, 2025

By ECF

The Honorable Eli Richardson  
United States District Judge  
Fred D. Thompson U.S. Courthouse and Federal Bldg.  
719 Church Street, Suite 5325  
Nashville, TN 37203

Re: *United States v. Matthew Isaac Knoot*  
Criminal No. 3:24-CR-00151

Dear Judge Richardson:

The government hereby notifies the Court of its filing earlier today—with the Classified Information Security Officer—of a classified *ex parte, in camera*, motion under seal for a protective order pursuant to the Classified Information Procedures Act, Title 18, United States Code, Appendix III, Section 4, and Federal Rule of Criminal Procedure 16(d)(1), with related materials. A copy of the motion's cover page, with classification markings removed, and a proposed unclassified order on the motion are enclosed.

Respectfully submitted,

/s/ Gregory Jon Nicosia, Jr.  
Gregory Jon Nicosia, Jr.  
Trial Attorney  
National Security Division  
National Security Cyber Section

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>No. 3:24-CR-00151</b>
<b>v.</b>	)	<b>JUDGE RICHARDSON</b>
	)	
<b>MATTHEW ISSAC KNOOT</b>	)	
	)	

**GOVERNMENT’S CLASSIFIED *EX PARTE*, *IN CAMERA*, UNDER SEAL MOTION  
AND MEMORANDUM OF LAW IN SUPPORT OF PROTECTIVE ORDER PURSUANT  
TO SECTION 4 OF THE CLASSIFIED INFORMATION PROCEDURES ACT AND  
RULE 16(d)(1) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE**

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>No. 3:24-CR-00151</b>
<b>v.</b>	)	<b>JUDGE RICHARDSON</b>
	)	
<b>MATTHEW ISSAC KNOOT</b>	)	
	)	

**[PROPOSED] UNCLASSIFIED ORDER**

The Court, having carefully considered the government’s Classified *Ex Parte, In Camera*, Under Seal Motion and Memorandum of Law in Support of a Protective Order Pursuant to Section 4 of the Classified Information Procedures Act and Rule 16(d)(1) of the Federal Rules of Criminal Procedure (“Motion”), and the attachments thereto, hereby **GRANTS** the Motion.

Accordingly, it is ORDERED that the Clerk of Court shall send a copy of this Order to counsel for the Defendant and the government;

It is further ORDERED that the Classified Information Security Officer shall deliver a copy of the Court’s Classified Order regarding the Motion to the government;

It is further ORDERED that, consistent with the Court’s Classified Order, the government shall withhold from discovery certain classified information as set forth in the Motion.

It is so ORDERED on this \_\_\_\_\_ day of \_\_\_\_\_, 2025

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HON. ELI RICHARDSON  
UNITED STATES DISTRICT JUDGE